

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING)	
PHARMACY, INC. PRODUCTS LIABILITY)	
LITIGATION)	
)	MDL No. 13-2419
)	Dkt. No 1:13-md-2419 (RWZ)
_____)	
THIS DOCUMENT RELATES TO:)	
)	
All Cases Against the Saint Thomas)	
Entities)	
)	
_____)	

**ASSENTED TO MOTION FOR EXTENSION OF TIME AND NOTICE OF
STATUS OF SETTLEMENT AGREEMENT**

Pursuant to the Court’s September 7, 2016, order (Docket #3083), the Plaintiffs’ Steering Committee (“PSC”) and the Saint Thomas Entities¹ and STOPNC Defendants² (“Settling Defendants”) jointly move for a one-week extension of time to complete the deadline for finalizing their settlement to September 16, 2016. As grounds for this motion, the PSC and Settling Defendants state that the extension will allow them the necessary time to work out a process for handling the Medicare and other third-party liens in connection with the settlement.

At the last status conference, the PSC reported on the progress of implementing a Term Sheet for a Global Settlement with the Settling Defendants into a Master Settlement Agreement and individual releases (“Tennessee Settlement”). The material terms of this settlement have been agreed to for quite some time, but the parties are continuing to negotiate the final language of the

¹ Saint Thomas West Hospital, formerly known as St. Thomas Hospital, Saint Thomas Network, and Saint Thomas Health.

² Saint Thomas Outpatient Neurosurgical Center, LLC; Howell Allen Clinic, a Professional Corporation; John Culclasure, MD; Debra Schamberg, RN; Vaughan Allen, MD.

Master Settlement Agreement and Individual Releases. The parties have exchanged multiple drafts of the Master Settlement Agreement and continue to work diligently to resolve any remaining differences.

The parties are optimistic that they will be able to resolve the remaining matters, but need the additional time requested to finalize the settlement documents and receive the necessary approvals from stakeholders. The parties will continue to keep the Court advised of their progress on the Tennessee Settlement.

SAINT THOMAS WEST HOSPITAL,
FORMERLY KNOWN AS ST. THOMAS
HOSPITAL, SAINT THOMAS NETWORK,
AND SAINT THOMAS HEALTH

By their attorneys,
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Dated September 9, 2016

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**Admitted pursuant to MDL Order No. 1

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Certificate of Service

This certifies that a true and accurate copy of the foregoing was served on all parties of record by virtue of the Court's electronic filing system this 9th day of September, 2016.

/s/ Marcy Hogan Greer
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